



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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DEC 19 2016

Ref: EPR-N

Oscar Martinez, District Ranger
Pikes Peak Ranger District
Attention: UMC Project
601 South Weber Street
Colorado Springs, CO 80903

RE: United States Environmental Protection Agency Comments for the Upper Monument
Creek Draft Environmental Impact Statement # 20160259

Dear District Ranger Martinez:

The U.S. Environmental Protection Agency Region 8 (EPA) reviewed the U.S. Department of Agriculture, Forest Service (USFS) November 4, 2016 Draft Environmental Impact Statement (Draft EIS) of the Upper Monument Creek Landscape Restoration Project (UMCLRP). Our comments are in accordance with authorities and responsibilities under Section 102(2)(C) of the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Project Description

The project area is just west of the United States Air Force Academy, the Towns of Monument, and Palmer Lake, Colorado, and north of the cities of Manitou Springs and Colorado Springs. The UMCLRP project area encompasses approximately 70,600 acres of USFS, private and Colorado Roadless 2012 designated lands. The Pikes Peak Ranger District (the District), of the Pike National Forest (the Forest), prepared a Draft EIS for the UMCLRP to help shift the Upper Monument Creek (UMC) landscape toward more resilient forest conditions to support more natural forest structures, disturbance regimes, vegetative diversity, wildlife habitats, and proper functioning watersheds. A group of diverse stakeholders, the UMC Collaborative, identified a desired state for the Forest. That desired state envisions achieving a more natural range of forest diversity, heterogeneity and complexity than is currently in place in the Forest. This current state of vulnerable forest resiliency is due to anthropogenic development and wildfire suppression impacts on the age and structure diversity of the Forest. The UMC Collaborative's goal is that by promoting greater overall resilience to the forest, land managers will also be reducing risks to human lives, community infrastructure and natural benefits people obtain from the Forest.

To help reverse the Forest's current state, the District identified a purpose and need to (1) actively manage the landscape to increase the resiliency of the forest (2) address reduced forest

health, watersheds, wildlife habitats and (3) address the high risk of catastrophic wildfires. Due to the vulnerable forest ecosystem and inextricably linked community infrastructure protection that the District's approach intends to accomplish under the Modified Proposed Action (Alternative 2), the EPA supports this effort. Alternatives identified in the Draft EIS include:

- Alternative 1 (No Action): Under this alternative, vegetation management actions would not be employed on the UMC landscape. The departure of ecological conditions from a natural range of variability would persist. The vegetative conditions within the UMC landscape would continue to differ, in both structure and distribution, from historic forest conditions. The project area would also remain at risk from large-scale, high-intensity wildfire due to an altered fuel load and structure resulting from increases in tree density, encroachment of shade tolerant tree species, or loss of shade intolerant tree species.
- Alternative 2 (Modified Proposed Action): The intent of the proposed action is to restore more resilient ecological conditions across the entire landscape and particularly Front Range forests; reduce the impacts of severe wildfires on property, infrastructure, and natural resources; and contribute towards the long-term sustainability of a full range of forest values including creating effective wildlife habitat and protecting aquatic resources. The proposed action entails the treatment of up to 31,700 acres within the 70,600 acre UMC project area. A combination of mechanical thinning with product removal, service work, manual thinning, pile burning, post treatment broadcast burning, and first entry prescribed fire would be utilized to achieve the desired ecological conditions. Implementation of these management actions is expected to begin in 2016 or 2017, and extend over a period of 10 years or more.

The project is adaptive through design, implementation, and monitoring. Based upon the effects of the treatment methods identified in the Modified Proposed Action, the responsible official can decide: (1) the location and treatment methods for restoration activities; (2) timing of treatments across the landscape; and (3) design criteria, mitigation, and monitoring requirements.

Comments and Recommendations

Based on information identified during scoping and new information included in the Draft EIS, our remaining comments and areas of recommendation are intended to reiterate comments made in our July 7, 2014 scoping letter that have not been addressed, further inform the decision to be made and the public's understanding of potential impacts to public health and the environment. The EPA's comment topics and recommendations include: (1) resilience and baseline information, (2) avoiding aquatic resource impacts, (3) air quality, including greenhouse gas emissions and climate change, and (4) general readability of maps and figures, and relevant citations for justifying the number of alternatives analyzed. These issues serve as the basis for the EPA's EC-2 rating discussed in the closing of this letter.

(1) Resilience and Baseline Information

The EPA agrees with the USFS's statements in the Draft EIS that resilient forests respond better to large high intensity wildfires, insects and disease outbreaks, and extreme water flows, and that

this is important for the nearby communities particularly given the intense erosion and debris flows known to occur in the analysis area, and that the Draft EIS addresses most of our comments made in our scoping letter.

The EPA notes the USFS's preference, as stated in several sections throughout the Draft EIS, is to remain flexible, use adaptive management to pursue the proposed action over 10 years (or more if needed), monitor progress, and change approaches as necessary based on the results observed and resources available to effectively complete the proposed action. As identified in many reports and included in the Cumulative Effects Section of the Draft EIS, natural resources and community infrastructure have been severely impacted from fires and flooding, resulting in significant hardship and unavailable community recovery costs. The continued diminished vegetation and scorched soils in the project area increase risk of continued sediment loading and debris flows. The EPA recommends that the USFS identify and report results early in the proposed action (first year, and every year for the first three years). The EPA continues to recommend that the Final EIS include a more detailed breakdown of specific projected activities and a robust commitment to an annual status report to the public for at least the first three years, assuming a minimal annual budget for project activities will be authorized. In addition, the EPA recommends a more specific list of priority projects be included in the Final EIS in order to identify, help address the need for urgent action, and assure surrounding communities that the highest priority projects will be addressed first, even under a constrained budget scenario.

(2) Avoiding Aquatic Resource Impacts from Project Activities

As stated in our July 2014 scoping letter, the EPA considers protection of aquatic resources to be among the most important issues to be addressed in any NEPA analysis of projects in our national forests. Most forest treatments contemplated under the proposed action (e.g., removal, thinning, mastication, prescribed fire and road construction), and all reclamation work have the potential to adversely impact aquatic resources. The EPA notes that the USFS addressed most of our aquatic resource related scoping comments. This included:

- Identifying many specific aquatic resources (e.g., project relevant streams and reservoirs);
- Including the current health and functional status;
- Including the detailed transportation management plan with aquatic resources impact mitigation efforts, procedures for temporary or seasonal roads management, and road closure/rehabilitation programs; and
- Including protections for springs, seeps and other wetlands by excluding such areas from any mechanized activity during the proposed project.

In order to more effectively disclose the nexus of treatment efforts to potential aquatic resource impacts, we continue to recommend that the Final EIS clearly identify the aquatic resources likely to be impacted by the treatments and in need of being avoided or restored. We note that the Table of Treatments Under the Proposed Action (Draft EIS, p. 45) and the Appendix B Watershed Condition Class Framework Table provide useful information on what the treatments are and what the watershed conditions are. The Draft EIS also identifies the streams and

conditions of the streams by disclosing whether they are impaired or not. In addition, we recommend including a high quality map of all aquatic resources in the project area, if possible, overlaid, or, at minimum, juxtaposed next to a higher resolution map with the proposed project's planned vegetation treatment areas in order to assess which water resources are near recommended treatment areas. (*i.e.* a water resources map with an improved Fig. 4 "Map of The Proposed Action" pg. 35).

(3) Evaluating Air Quality Effects, Green House Gas Emissions and Climate Change

The EPA continues to recommend that the Final EIS evaluate impacts resulting from the alternatives by providing a thorough characterization of existing air quality conditions in the area to establish the baseline conditions of the area. To that end, we recommend the Final EIS include the following information regarding existing conditions:

- Identification of the criteria pollutants and the appropriate National Ambient Air Quality Standards (NAAQS), *i.e.*, ozone, particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide and lead;
- Identification of sensitive air pollution receptors in the vicinity (such as population centers, Class I areas and Sensitive Class II areas);
- Airshed classifications and baseline conditions at nearby population centers;
- Disclosure of any regional concerns in the area (e.g., PM10, PM2.5 or ozone issues);
- Trending of air quality at nearby Class I Federal areas over the past several years.

As stated in our scoping letter, such data are readily available from the Colorado Department of Public Health and Environment (CDPHE) or the VIEWS site for air quality related values (AQRVs) (<http://views.cira.colostate.edu/web/>). Information regarding current conditions will be an important tool for monitoring the impacts of the various project activities. Decision makers will benefit from an understanding of baseline conditions in an effort to ensure that, when combined with air quality impacts from external sources, project activities do not adversely impact the NAAQS or AQRVs such as visibility.

Further, these emissions could and should be addressed through project design criteria and monitoring in the Final EIS. Example measures to consider include the following:

- Limit idling of heavy diesel equipment and transportation vehicles.
- Use low-sulfur or alternative fuels.
- Monitor effectiveness of road closures after project completion.
- Require detailed plans for dust control.
- Require prompt revegetation of disturbed areas and temporary roads. Monitor for five years to ensure successful revegetation.

The EPA recognizes that extensive information and references were included in the Draft EIS on proposed Best Management Practices (BMP) guidelines, references, specific prescribed fire acreage estimates, prescribed fire objectives and expected related resiliency outcomes.

The EPA notes the thorough analysis and disclosure of likely climate change impacts on the project area and project area resources within it in the Draft EIS. The EPA also notes that the Draft EIS references the Sedjo et al. 1995 report that suggests managing forests through harvesting and thinning operations can result in conditions that are ecologically favorable and can increase “carbon sequestration.” As such, EPA recommends the following for the decision maker to consider in developing the Final EIS:

- In order to better understand how effective treatments in the proposed project area have been, and to demonstrate treatments that have contributed to carbon storage, the EPA recommends the USFS identify and provide more specific information in the Final EIS on how, during the proposed action’s implementation, the USFS will keep track of and quantify which treatments have enhanced carbon storage and which treatments have not.
- To assist with the above recommendation, the EPA continues to encourage the District to take advantage of the timing of this land management effort to support and possibly influence the emerging science on carbon inventory methodologies and forest management which is currently the focus of several USFS’ Forest Inventory and Analysis programs (see: <http://www.fia.fs.fed.us/forestcarbon/> and <http://www.fs.fed.us/climatechange/documents/RockyMountainRegionCarbonAssessmentTwoBaselines.pdf>).

If by the time the final EIS is completed and the use of removed wood is known, we continue to recommend discussion of possible indirect impacts from the use of removed trees. For instance, if the removed wood will be used as feedstock for supplying fuel at a facility that provides heat and/or power, or would be converted to wood pellets or biofuels, rather than be left to degrade in place or other uses (e.g. recycled and reprocessed wood products such as furniture or building materials), then we continue to recommend the Final EIS include a discussion of the specific use and related air quality impacts, including an estimate of associated GHG emissions.

(4) General Readability of Maps and Figures and Relevant Citations for Justifying Number of Alternatives Analyzed

The Draft EIS provides detailed figures and maps that are helpful in understanding the rational and objectives of the proposed action. Several maps, figures and (mostly) legends that are important for understanding the Draft EIS alternatives’ analyses, proposed project boundaries, specific status of land use and affected areas of treatment, are not easily readable due to the limited resolution. Using the CD version of the Draft EIS to enlarge the images, it is not possible to visually identify key boundaries and elements of the treatment areas, understand the scope and differentiation of the specific vegetation categories and current land uses (e.g. Figure 2. Map of changes made to the proposed action boundary, Figure 4. Map of the Proposed Action, Figure 9. CUSP Lands Assessment of potential treatments around Palmer Reservoir with Rampart East Colorado Roadless Area, Figure 17. Map of national Forest roads and systems trails within UMC, Figure 18. Recreation Opportunity Spectrum Map). For these figures and maps, the EPA recommends that higher resolution images and maps be used in the Final EIS.

The EPA notes that the Draft EIS analyzes and presents one no action alternative and only one

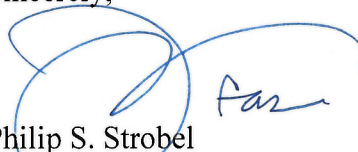
action alternative. The Draft EIS also identifies several statutes, executive orders, management directives and guidance documents throughout the Draft EIS that either require and/or influence how and why the USFS presented the NEPA analysis and the proposed action (which is also the only action alternative). While the document often refers to goals and requirements for successfully moving toward a healthier forest, and specifically mentions an iterative NEPA process for including a Modified Proposed Action, no specific reference is made to a specific statute, executive order, management directive, guidance or initiative (*e.g.* Healthy Forests Initiative) document directing the USFS to consider and present only one action alternative. The EPA recommends a specific reference related to this decision be included early in the Final EIS (*e.g.* identified in the Management Direction section on page 25, where other specific references are), or included in the list of references near the end.

Closing

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed Project, the EPA is rating the proposed action, which is also Modified Alternative 2, as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the Final EIS in order to fully assess environmental impacts. A description of the EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings.html>.

We appreciate the opportunity to participate in the review of this project, and are committed to working with you as you prepare the Final EIS. If we may provide further explanation of our comments, please contact me at 303-312-6704, or your staff may contact Nat Miullo, Lead NEPA Reviewer, at 303-312-6233.

Sincerely,

A handwritten signature in blue ink, appearing to read "P. Strobel", with a large, stylized circular flourish above it.

Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc: Carin Vadala, Pikes Peak District Planner